



STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
MARLENE J. FLUHARTY  
ORDON E. GUYER  
JERRY KAMMER  
ELLWOOD A. MATTSON  
O. STEWART MYERS  
RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING  
P.O. BOX 30028  
LANSING, MI 48909

DAVID F. HALES, Director

April 11, 1990

Mr. Timothy Core, Environmental Engineer  
Cadillac Motor Car Division  
General Motors Corporation  
2860 Clark Street  
P.O. Box 297  
Detroit, Michigan 48232-0297

Dear Mr. Core:

SUBJECT: Closure of Hazardous Waste Container Storage Area  
Cadillac Motor Clark Street Plant  
MID 005 356 704

Waste Management Division (WMD) has reviewed your November 15, 1989, request to extend the closure period by 180 days for the container storage area at the Cadillac Motor Clark Street Plant due to soil contamination discovered as part of the closure activities.

We agree that based on the presence of soil contamination and the need to assess the extent of this contamination, additional time for closure is necessary. Since that time, my staff have worked with you to develop an acceptable "Phase II" work plan for evaluating the extent of the contamination which was submitted to WMD on March 7, 1990. This phase II work plan is hereby approved and becomes an enforceable part of the approved closure plan. Your request to extend the closure period is hereby approved. Phase II of the closure must be completed and the findings submitted along with a phase III remedial action plan to me by June 15, 1990.

The phase III remedial action plan must be submitted as a written request to amend the approved closure plan as required by 40 CFR §265.112 and include a schedule and date for final completion of closure. The phase III plan must also be accompanied by a request to extend the closure period to the date specified in the plan. The phase III plan must be reviewed and approved by the Waste Management Division before implementation by the facility. Once approved, this plan will become an enforceable part of the closure plan.

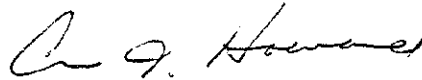
Failure to comply with the approved closure plan, or to adhere to the deadlines and procedures specified in this letter may result in formal enforcement action.

Mr. Timothy Core  
Page 2  
April 11, 1990

Closure of interim status units does not release the company from any plant-wide corrective action responsibilities it may have under the federal Hazardous and Solid Waste Amendments of 1984 (HSWA) to the Resource Conservation and Recovery Act of 1976 (RCRA).

If you have any questions regarding this approval, please contact Mr. Peter Quackenbush of my staff at 517-373-7397.

Sincerely,



Alan J. Howard, Chief  
Waste Management Division  
517-373-9523

cc: Ms. Marilyn Sabadaszka, U.S. EPA  
Mr. Richard Traub, U.S. EPA  
Dr. Ben Okwumabua, DNR - Northville  
Mr. Steve Buda, DNR  
✓ Ms. De Montgomery, DNR  
Mr. Peter Quackenbush, DNR  
C&E File



*Cadillac*

MOTOR CAR DIVISION GENERAL MOTORS CORPORATION

RECEIVED

MAR 12 1990

Waste Management  
Division

March 7, 1990

Ms. D. Montgomery  
Waste Management Division  
Michigan DNR  
Ottawa Street Bldg. - South Tower  
P. O. Box 30028  
Lansing, MI 48090

Dear Ms. Montgomery:

Attached is the revised Phase II work plan for the closure of the RCRA container storage area at the GM Cadillac Motor Car Division - Clark Plant.

Please contact me at (313)554-6599 if you have questions regarding this plan.

Sincere Thanks,

Timothy A. Core  
Environmental Engineer

TAC:ljt

Attachment

pc: P. Quackenbush, MDNR

Phase II Work Plan for Closure of the  
RCRA Designated Container Storage Area,  
Clark Street Plant  
Detroit, Michigan

## Introduction

In accordance with Michigan Hazardous Waste Rules, The Chester Engineers (Chester) prepared a closure plan for the General Motors Cadillac Clark Street Plant to close the Designated RCRA Container Storage Area (hazardous waste drum storage area). On April 3, 1989, as dictated by the closure plan, two soil samples were collected from one foot beneath the hazardous waste drum storage area. The analysis completed on these samples detected volatile organic compounds (VOCs) requiring that Phase I of the soil investigation recommended in the closure plan be undertaken.

Detroit and adjacent communities are built on essentially flat, lake plain sediments formed during the early glacial stages of the Erie Basin. At the Clark Street Plant, near surface materials consist mainly of fill and some sandy or silty deposits, generally 8-12 feet thick. Underlying the surficial sediments is a thick mantle of firm silty clay with occasional sand lenses and pebbles. This unit is locally called "blue clay" and is up to 130 feet thick at the Clark Street local. The clay has a inherently low hydraulic conductivity and forms a semipermeable barrier (aquatard) between the lower aquifer(s) and the perched aquifer at the surface.

Field activities for the soil investigation recommended in Phase I of the closure plan were conducted by Chester personnel on August 22 and 23, 1989. The closure plan stated that the area was 60' x 80' calling for twelve 20' x 20' grids; however, the area was measured at 58' x 51' thus only nine grids were laid out (six grids at 17' x 20' and three grids at 17' x 18'). Four soil samples were collected and composited from each grid from one foot below the concrete pad.

The analytical results, presented in Table 1, of the samples collected in Phase I exhibited detectable concentrations of VOCs in eight of the nine grids. These results indicate that the contamination is not isolated to one or two areas below the hazardous waste drum storage area.

## Work Plan - Phase II and III

Because VOCs were detected in the samples collected in the Phase I investigation, the closure plan requires the implementation of Phase II. The Phase II soil investigation calls for the collection and analysis of soil samples outside of the hazardous waste drum storage area to determine if the contamination detected in Phase I has migrated. The closure plan requires that a risk assessment then be conducted to evaluate the analytical results of Phases I and II.

The Phase II and Phase III activities outlined on page 15 of the closure plan are described as follows:

Phase II - If contamination is not isolated to one or two areas, sample outside of the boundaries of the hazardous waste drum storage area to determine if the contamination has migrated.

Phase III - Perform a Risk Assessment to determine the potential for environmental impact and the need for a remedial action plan.

This work plan further defines the activities generally outlined in Phase II of the closure plan.

In accordance with the closure plan, Phase II soil samples will be collected from four borings located outside of the boundaries of hazardous waste drum storage area. Three of the borings (SB-5, SB-6, SB-7) will be located in areas where waste management activities have not taken place, and one boring (SB-8) will be located in the non-hazardous container storage area (west of the hazardous waste drum storage area) as shown on Figure 1.

Four additional borings (SB-1, SB-2, SB-3, SB-4), not required by the closure plan, will be completed within the hazardous waste drum storage area. These borings will be advanced to approximately ten feet to document the vertical extent of elevated VOCs detected in Phase I. They will be located spatially over the hazardous waste drum storage area as shown on Figure 1. Placement of the borings located inside the hazardous waste drum storage area is designed to document the overall condition of the soil beneath the area. The results of analyses completed during the Phase I investigation were also considered during boring placement.

The sum of detectable measurements of ethylbenzene, methylene chloride, toluene, 1,1,1-trichloroethane, methyl ethyl ketone and xylenes from soil samples collected during Phase I are presented below (the data for the individual parameters are presented in Table 1.).

<u>Grid Number</u>	<u>Sum of Measured Concentrations (PPB)</u>
1	1,447
2	863
3	4,287
4	335
5	194
6	145
7	1,330
8	None Detected
9	599

SB-1, SB-2 and SB-3 are placed in sample grid numbers 1,7, and 3, respectively. These are the grids which contained the three highest results from the Phase I sampling. SB-4 is placed in grid number 9. This location completes the aerial coverage and provides a boring in the grid with the fifth highest sample results from Phase I. (Placement of a boring in grid number 2, the grid with the fourth highest sample results, would not have achieved the desired aerial coverage.) The boring locations within the hazardous waste drum storage area achieves the desired aerial coverage, samples the grids with the highest VOC results (shallow sample), and avoids sampling in locations where low VOC results (shallow sample) were obtained during Phase I.

The borings will be advanced with a hollow stem auger, and samples will be continuously collected with a split barrel sampler at 2 foot intervals. Each boring will penetrate at least two feet into the "blue clay" making them approximately ten feet in depth.

If encountered during Phase II field activities, groundwater will be sampled, and the installation of a groundwater monitoring well will be considered based on the amount and depth of groundwater encountered.

Soil boring logs will be composed by the on-site Chester geologist describing the soil and it's condition for each boring. Soil descriptions will be based upon field observations, noting grain size and distribution, color, moisture content, and split-barrel penetration blow counts.

All in-hole equipment will be decontaminated prior to each use; augers will be steam cleaned, and sampling equipment will be washed with Liqui-Nox soap and rinsed with water. All borings will be backfilled with a non-shrink grout. The concrete slab at boring locations within the hazardous waste drum storage area will be repaired with non-shrink epoxy grout in accordance with the approved closure plan.

All Phase II field activities will be conducted in accordance with the Chester health and safety plan developed for the Clark Street Closure project.

The Phase II soil samples collected will be sent to the ChesterLab following chain-of-custody procedures, and will be analyzed utilizing methods described in the approved closure plan and listed on Table 1. The analytical results of the soil samples will indicate the vertical and horizontal extent of contamination.

Depending on the results of Phase II, a Risk Assessment may be performed to determine the potential for environmental impact and the need for a remedial action plan based on the analytical results of the closure project.

LABORATORY ANALYSIS REPORT  
FOR  
GENERAL MOTORS CORPORATION  
BOC GROUP  
CLARK STREET PLANT

Table 1

Source	SAMPLE SECTOR 1	SAMPLE SECTOR 2	SAMPLE SECTOR 3	SAMPLE SECTOR 4	SAMPLE SECTOR 5	SAMPLE SECTOR 6	SAMPLE SECTOR 7	SAMPLE SECTOR 8	SAMPLE SECTOR 9
Log Number 89	08702	08703	08704	08707	08708	08709	80710	08705	08706
Date Collected	8/22/89	8/23/89	8/23/89	8/23/89	8/23/89	8/23/89	8/23/89	8/23/89	8/23/89
Sample Points Compositied:	S.P.1-4	S.P.5-8	S.P.9-12	S.P.13-16	S.P.17-20	S.P.21-24	S.P.25-28	S.P.29-32	S.P.33-36
Analysis									
Ethylbenzene, PPB	180	<50	501	<50	<50	<50	<50	<50	<50
Methylene Chloride, PPB	<50	<50	<100	<50	<50	<50	<50	<50	<50
Toluene, PPB	582	54	436	<50	121	<50	630	<50	57
1,1,1-Trichloroethane, PPB	68	164	150	335	<50	58	<50	<50	<50
Methyl Ethyl Ketone, PPB	521	494	<50	<50	<50	<50	600	<50	383
Xylenes, PPB	123	151	3,200	<50	73	87	100	<50	150

Unless otherwise noted, analyses are in accordance with the methods and procedures outlined and approved by the Environmental Protection Agency and conform to quality assurance protocol.

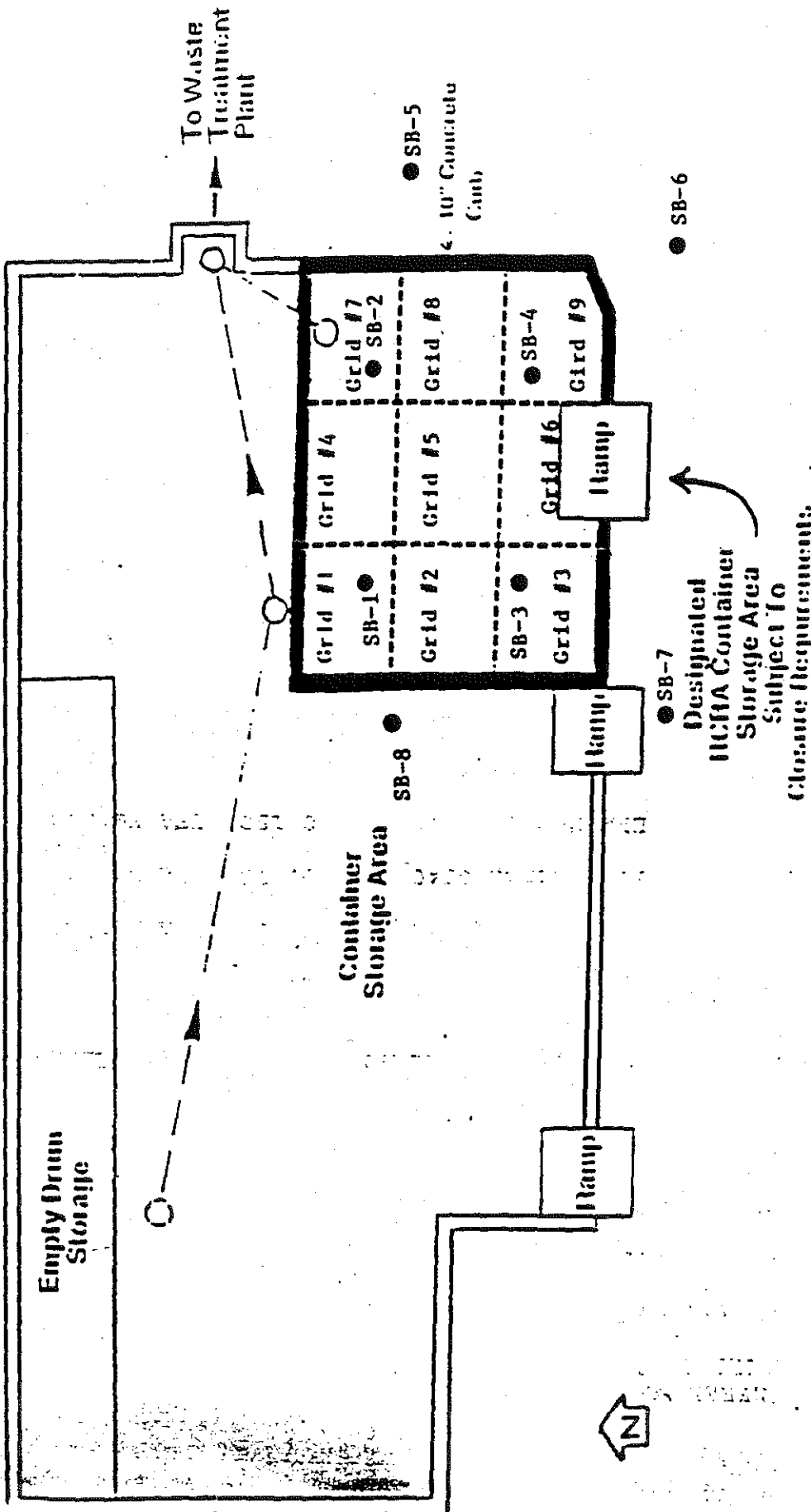
"Less-than" (<) values are indicative of detection limit.



Clark Street Plant  
 Detroit, Michigan  
 Hazardous Waste Pad Closure  
 Phase II Soil Boring Locations

SHEET NO.	DWG. NO.	Figure 1	CHK'D BY: JSB	SCALE: 1"=40'	APP'D BY: CEY	DATE: 12/12/89

**The Chester Engineers**



Designated  
 NCTA Container  
 Storage Area  
 Subject to  
 Closure Requirements

● Soil Sampling Locations

DEPARTMENT OF NATURAL RESOURCES  
WASTE MANAGEMENT DIVISION

## STAFF REPORT

DAY

S	M	T	W	TH	F	S

- ☐ Complaint Inspection  
☐ Compliance Inspection  
☐ Construction/Closure Inspection  
☐ Permitting Inspection  
☐ PEAS Investigation

- ☐ PCB Report/Complaint  
☐ Sampling Inspection  
☒ Telephone Call  
☐ Meeting Notes  
☐ Other \_\_\_\_\_

WEATHER

TEMP

WIND

HUMIDITY

Brite Sun	Clear	Overcast	Rain	Snow
To 32	32-50	50-70	70-85	85 up
Still	Moder.	High	Report No.	
Dry	Moder.	Humid.		

☒ Act 64☐ Act 136☐ Act 641☐ HSWA☐ Act 245☐ RCRA

DATE

2/9/90

TIME

11:20

COMPANY/FACILITY

GM - Cadillac Car Division

FACILITY NO.

MID 005 356 704

ADDRESS/LOCATION

Detroit MI

STAFF

D. Montgomery

PARTICIPANTS

Tim Core - GM

Called Tim Core. First apologized for the time it has taken for us to get hold of each other (over a week).

I discussed the Jan. 18, 1990 submitted by Checker Engineers. I explained to Tim that although some items that we had discussed on 12/19/89 had been addressed (and had been addressed quite well). 3 had not. These three are:

- 1) justification for the selection of grids 1, 3, 7 & 9.
- 2) logging specifications
- 3) content of gas in encountered - installation of temporary wells, samples, flow direction etc.

These items need to be incorporated into the Phase II work plan and a new revised work plan submitted for review. Tim said he would call Fran Youell of Checker Engineers, inform him of this discussion and have him call me if they call. All items must then be done.

SIGNED

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
MARLENE J. FLUHARTY  
GORDON E. GUYER  
KERRY KAMMER  
C. STEWART MYERS  
DAVID D. OLSON  
RAYMOND POURCURE

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING  
P.O. BOX 30028  
LANSING, MI 48909

DAVID F. HALES, Director

December 15, 1988

Mr. Ronald G. Pordon, Superintendent  
Environmental Engineering  
Cadillac Motor Car Division  
General Motors Corporation  
2860 Clark Street  
P.O. Box 297  
Detroit, Michigan 48232-0297

Dear Mr. Pordon:


Subject: Act 64 Closure Plan for Cadillac Motor Car Division  
Clark Plant MID 005 356 704

The Waste Management Division has completed review of the Clark Plant container storage area closure plan submitted on June 27, 1988. The closure plan does not comply with the interim status closure requirements in 40 CFR Part 265, Subpart G, and therefore must be revised according to the enclosed Notice of Deficiency.

Please submit four copies of your revised container storage area closure plan to the Waste Management Division within thirty days of receipt of this letter.

Please call me if you have questions regarding the notice of deficiency.

Sincerely,

  
Peter Quackenbush  
Environmental Engineer  
Waste Management Division  
517-373-7397

Enclosure

cc: Mr. Rich Traub, U.S. EPA  
Ms. Marilyn Sabadaszka, U.S. EPA  
Mr. Ken Burda, DNR/C&E file  
Mr. Ben Okwumabua, DNR

GENERAL MOTORS CORPORATION  
CADILLAC MOTOR CAR DIVISION  
CLARK PLANT  
MID 005 356 704

NOTICE OF DEFICIENCY FOR CLOSURE

PLAN SUBMITTED JUNE 22, 1988

1. The proposal to establish background levels for organic parameters to determine contamination is not acceptable unless documentation is provided that those parameters are naturally occurring in soils on a regional basis. If the organic hazardous constituents of waste stored at the site are not naturally occurring, nondetectable levels will be the criteria for determining contamination. Clean closure will not be achieved unless all contamination is removed.
2. A review of documentation in Waste Management Division files indicates that E.P. toxic wastes D007 (chromium) and D008 (lead) were stored at this facility. Therefore, chromium and lead must be added to the list of parameters to be analyzed for when determining if contamination exists. The analysis must be done using SW 846 methods for total metals. The files also indicate the F001 waste was stored at this facility so the plan must specify indicator parameters and methods for that waste type.
3. The appropriate SW 846 (3rd edition 1986) analytical methods and detection limits must be specified in Table 2 for all sampling and analysis to be conducted as part of closure.
4. The locations for coring and sampling soils under the container storage pad must be specified in the closure plan. The locations (two minimum) must be at low points in the containment and areas where the pad is cracked and/or there is evidence of spillage.
5. The plan should specify that the Waste Management Division be notified five (5) working days prior to soil sampling activities to allow the division time to schedule staff for observation.
6. The closure certification must be revised to include all the applicable items of the attached closure certification checklist guidance document.
7. A copy of the up-to-date financial test must be included in the closure plan.
8. In order to continue to use the hazardous waste storage areas for generator storage less than 90 days after decontamination and repair to correct any structural problems is completed, the concrete must be sealed using materials compatible with the wastes to be stored.
9. The closure plan must specify what procedures will be followed if contamination is detected to determine the extent of contamination, so an appropriate remedial action program can be developed.

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

Southeast Michigan Field Office  
Hazardous Waste Division  
15500 Sheldon Road  
Northville, MI. 48167

July 1, 1985

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
E. R. CAROLLO  
MARLENE J. FLUHARTY  
STEPHEN F. MONSMA  
O. STEWART MYERS  
RAYMOND POUPORE  
HARRY H. WHITELEY

General Motors Corporation  
Cadillac Motor Car Division  
Attn: R. G. Pordon, Superintendent Environmental Activities  
2860 Clark Avenue  
Detroit, MI. 48232

Re: MID 005356704

Dear Mr. Pordon:

This letter is to acknowledge receipt of your letter dated June 20, 1985 providing additional information regarding your closure plan. I consider your response acceptable at this time, however the year of closure that you provided must be included in the closure plan.

Thank you for your cooperation.

Sincerely,

HAZARDOUS WASTE DIVISION

*Kenneth L. Damrel*

Kenneth L. Damrel, Environmental Engineer

KLD:m

cc: US EPA, Region V  
B. Okwumabua





June 20, 1985

State of Michigan  
Department of Natural Resources  
S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

RECEIVED  
JUN 24 1985  
HAZARDOUS WASTE DIV

ATTN: K.L. Damrel, Environmental Engineer  
Hazardous Waste Division

Dear Mr. Damrel:

Per your request of June 12, 1985, this letter, with attachments, is written to satisfy your requirements as specified in your correspondence for the Clark Avenue Storage Facility. (MID005356704).

Additionally, documentation is provided to satisfy the requirements of 40 CFR 265 Subpart H, as requested in items 2, 3 and 4 of your letter. Please note that our original response was to the request for submission of our Closure Plan under 40 CFR 265, Subpart G.

1. The estimated year of closure per 40 CFR § 265.112(a)4 is 2015.

For items 2, 3 and 4, please reference the attached material that has been sent to the E.P.A. Region V. office on March 15, 1985.

2. The cost estimate for closure per 40 CFR § 265.142 is \$39,500, updated, as per 40 CFR § 265.142(b), from \$37,900 as stated on page A4 of Attachment A.
3. The financial assurance mechanism required by 40 CFR § 265.143 is covered under item 1 on the first page of the first attachment.
4. The liability requirements for sudden accidental occurrences required by 40 CFR § 265.147 is covered under the second paragraph on the first page of the first attachment.

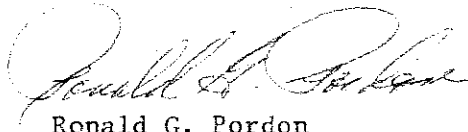
Since the Clark Avenue Storage Facility is neither a surface impoundment, landfill or a land treatment facility, it falls outside of the requirements for non-sudden accidental occurrences. (Please reference 40 CFR 265.147(b)).

Buick-Oldsmobile-Cadillac Group

General Motors Corporation 2860 Clark Street Detroit, Michigan 48210-3288

It is our understanding that the documentation required under 40 CFR 265, Subpart H is not required to be included in the Closure Plan and is not considered a violation as referenced in your letter. If this understanding is incorrect, please contact me by letter or at (313) 554-6596.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ronald G. Pordon".

Ronald G. Pordon  
Superintendent  
Environmental Activities

Attachment

cc: U.S.E.P.A. Region V  
B. Okwunabua

STATE OF MICHIGAN



S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
R. CAROLLO  
JACOB A. HOEFER  
STEPHEN F. MONSMA  
HILARY F. SNELL  
PAUL H. WENDLER  
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

June 12, 1985

General Motors Corporation  
Cadillac Motor Car Division  
2860 Clark Avenue  
Detroit, MI 48232  
Attn: R.G. Pordon, Superintendent  
Environmental Activities

RE: MID 005356704

Dear R.G. Pordon:

The Hazardous Waste Division has received your closure plan for the facility located at the above address. Based on review of the closure plan, the following deficiencies were noted:

1. The expected year of closure is not specified as required by 40 CFR §265.112(a)4.
2. The submitted closure plan did not contain a cost estimate for closure as required by 40 CFR §265.142.
3. The financial assurance mechanism for closure was not provided as required by 40 CFR §265.143.
4. The liability requirements for sudden and non-sudden accidental occurrences as required by 40 CFR §265.147 were not provided.

You are requested to respond to this letter by July 5, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script that reads "Kenneth L. Damrel".

Kenneth L. Damrel  
Environmental Engineer  
HAZARDOUS WASTE DIVISION

KD:jg

cc: U.S. EPA, Region V  
B. Okwumabua



MD 000 356 24



April 8, 1985

RECEIVED  
APR 12 1985

HWE 18

U.S. Environmental Protection Agency  
Hazardous Waste Enforcement Branch  
RCRA Enforcement Section-SHE-12  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: Letter of Warning  
SHE-12

Gentlemen:

Per your request, attached is a copy of the G.M.C. Cadillac Motor Car Division Hazardous Waste Storage Facility closure plan. Also per your request, two copies have been forwarded to the Michigan Department of Natural Resources, Hazardous Waste Division.

I regret that I did not send these closure plans prior to receiving a letter of warning. The reason for their late response was an internal communication problem in my office.

I trust you will find the closure plan in order. If you have any questions, please contact me. My phone number is (313) 554-6596.

R. G. Pordon  
Superintendent  
Environmental Activities

MD/pb

cc: Michigan Department of Natural Resources  
Hazardous Waste Division (2 copies)

Buick-Oldsmobile-Cadillac Group

General Motors Corporation 2860 Clark Street Detroit, Michigan 48210-3288

# VIII CLOSURE PLAN FOR CADILLAC'S HAZARDOUS WASTE STORAGE FACILITY

## 8.1 Introduction

Under the U.S. E.P.A. regulations, 40 CFR Part 265, Subpart G, Sections 265.110 thru 265.120, each facility which stores, treats or disposes of hazardous wastes must have a closure plan on file. This Closure Plan has been prepared to cover the following facility.

A. E.P.A. I.D. Number: MID005356704

B. Owner's Name: General Motors Corporation,  
Cadillac Motor Car Division  
2860 Clark Avenue  
Detroit, MI 48232

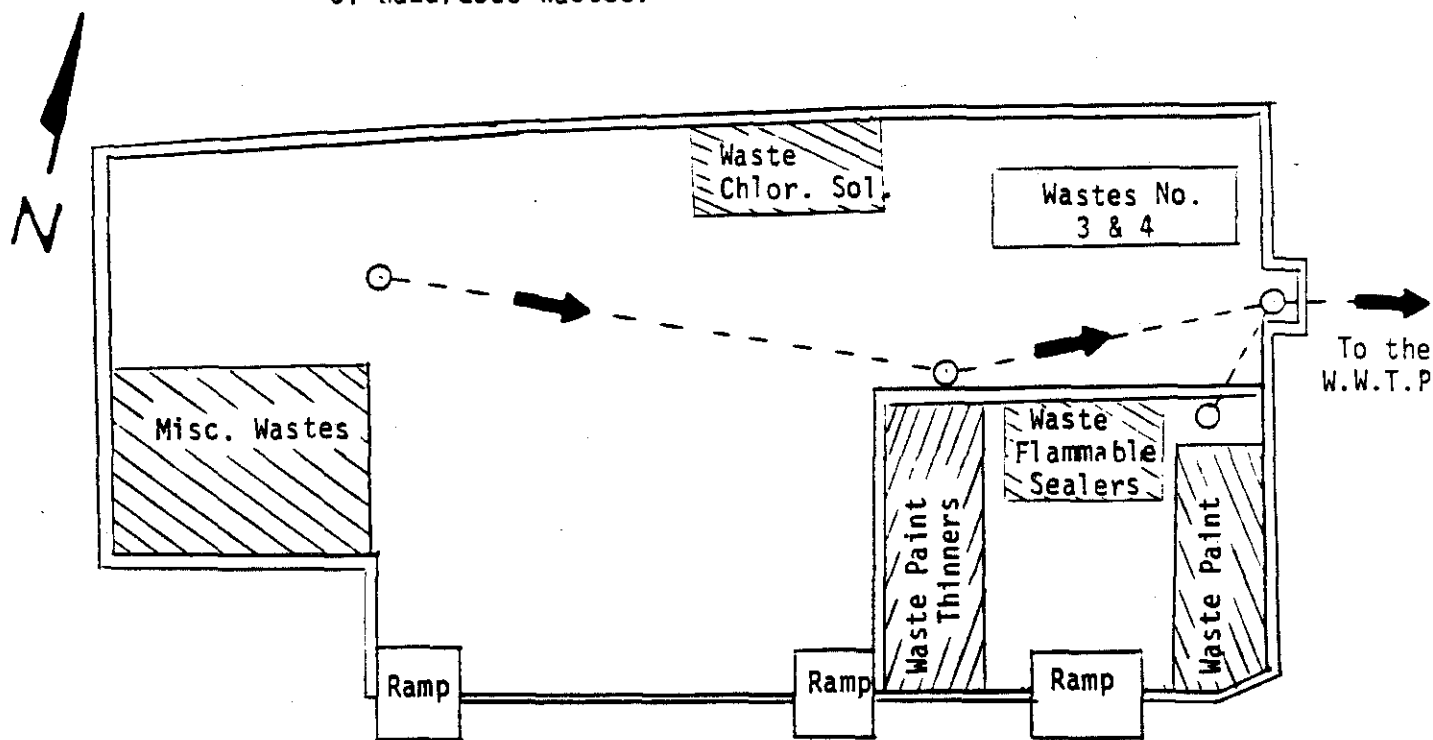
C. This plan has been prepared by:

Michael M. Draybuck  
Chemist  
10/20/81

and updated by:

Dale G. Gossiaux  
Environmental Engineer  
12/10/84

D. The attached chart shows Cadillac's facility for storage of hazardous wastes.



HAZARDOUS WASTE STORAGE FACILITY

## 8.2 Maximum Waste Inventory

The following table shows the maximum quantity of wastes on-hand at anytime and the maximum amount which could remain on-site after closure.

### Solid Waste

Cadillac Waste #3-4	25 Cubic Yards
---------------------	----------------

### Liquid Waste

Waste Paint - Solvent Based	75 (55 gal) drums
Waste Paint Thinner	150 (55 gal) drums
Waste Chlorinated Solvents	30 (55 gal) drums
Waste Flammable Sealers	80 (55 gal) drums
Waste Ammonia	30 (15 gal) drums
Waste Lapping Compound	30 (55 gal) drums

## 8.3 Decontamination

The following steps are needed for decontamination of the site upon closure:

1. Waste must be removed from the site.
2. Equipment used in the area must be steamed cleaned.
3. The facility must be washed.
4. The catch basin underneath the flammable/reactive section of the facility must be cleaned.

## B.4 Closure Schedule

This facility does not have a definite closure date. The following schedule is open ended. It lists the timetable for closure in terms of elapsed time subsequent to the time that the E.P.A. or an E.P.A. authorized state agency has approved this Closure Plan. (See section 265.112 (C)).

Day 1	-	Termination of hazardous waste storage activity on site.
Day 10	-	All solid waste (Cadillac #3-4) removed from the site. It will be disposed of at Wayne Disposal, Inc., Site #2.
Day 15	-	All waste paints removed from site. They will be sent to Petro-Chem, Inc., for fuel blending.
Day 17	-	All waste paint thinners removed from site. They will be reclaimed at U.S. Cemical, Chemical Recovery Systems or Nortru, Inc.

- Day 20 - All chlorinated solvents removed from site. They will be sent to Petro-Chem for Fuel blending.
- Day 25 - All scrap ammonia removed from site. It will be neutralized at Nelson Chemical Co.
- Day 30 - All flammable sealers removed from site. They will be incinerated at a rotary kiln yet to be determined.
- Day 31 - Steam clean the hi-lo used for hazardous waste management in the facility. All wastes generated as a result of this operation will be sent to Cadillac's Waste Water Treatment Plant.
- Day 32 - Detergent wash and steam clean the curb and pavement of the facility. All wastes generated as a result of this operation will be sent to Cadillac's Waste Water Treatment Plant.
- Day 35 - Empty, detergent wash, and steam clean the catch basin located below the flammable/reactive portion of the facility. The waste generated as a result of this operation will be tested at that time to determine the proper disposal method for it. The cleaned catch basin will remain as a part of Cadillac's sewer system.
- Day 40 - Closure completed.
- Day 45 - Certification of closure by an independent registered professional engineer.

**MAR 29 1985**

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

GMC Cadillac Motor Car  
Clark Plant  
2860 Clark Street  
Detroit, Michigan 48229

Re: Letter of Warning  
GMC Cadillac Motor Car  
Clark Plant  
MID 005 356 704

Gentlemen:

On January 23, 1985, the Michigan Department of Natural Resources (MDNR) requested the GMC Cadillac Motor Car, Clark Plant to submit a copy of their closure plan. To date, MDNR has not received the company's closure plan.

The MDNR is obligated to review the adequacy of closure plans under 40 CFR 265 Subpart G through the FY 85 Hazardous Waste Cooperative Agreement with the U.S. Environmental Protection Agency (U.S. EPA).

Because the GMC Cadillac Motor Car, Clark Plant failed to submit a copy of their closure plan to MDNR, the U.S. EPA is requesting that GMC Cadillac Motor Car, Clark Plant provide our Agency with a copy of the closure plan. Failure to provide this plan within 30 days of receipt of this notice will subject the facility to further enforcement action. Please forward a copy of an up-to-date closure plan to:

U.S. Environmental Protection Agency  
Hazardous Waste Enforcement Branch  
RCRA Enforcement Section - 5HE-12  
230 South Dearborn Street  
Chicago, Illinois 60604

Two additional copies of the closure plan should also be sent to:

Michigan Department of Natural Resources  
Hazardous Waste Division  
15500 Sheldon Road  
Northville, Michigan 48167

If you have any questions, please contact Ms. Sharon R. Johnson of my staff at (312) 886-4592.

Sincerely yours,

William E. Muno, Chief  
RCRA Enforcement Section

cc: J. Bohunsky, MDNR  
B. Okwumbua, MDNR  
S.E. District Office

SRJOHNSON:srj:WI/MI Unit:3-27-85

INITIALS	DATE	TYPIST	AUTHOR	STU #1 CHIEF R. Kael 3-28-85	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF VEN 3-28-85	WMB	WHD

C. responded 4-12-85

STATE OF MICHIGAN



S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON  
E. R. CAROLLO  
MARLENE J. FLUHARTY  
STEPHEN F. MONSMA  
O. STEWART MYERS  
RAYMOND POUPORE  
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

January 23, 1985

GMC Cadillac Motor Car  
Clark Plant  
2860 Clark Street  
Detroit, Michigan

RE; MID 005356704

Gentlemen:

As part of our FY85 Hazardous Waste Management Cooperative Agreement with the U.S. EPA, we are obligated to review the adequacy of the closure and post-closure plans for all hazardous waste treatment storage and disposal facilities (TSDFs) in the state.

Your facility falls under this classification. Therefore, please submit two up-to-date copies of your closure plan for your treatment, storage, and disposal facility by February 15, 1985.

The above should be sent to the following address:

Hazardous Waste Division  
Michigan Department of Natural Resources  
15500 Sheldon Road  
Northville, MI 48167

If you have any questions regarding this letter, please contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script, appearing to read "Benedict N. Okwumabua".

Benedict N. Okwumabua, PhD.  
District Supervisor  
Hazardous Waste Division

cc: U.S. EPA  
J. Bohunsky  
A. Howard









General Motors Corporation

O: WMD ✓  
CC: RF

Mr. Valdas V. Adamkus  
Regional Administrator  
U.S. EPA Region V  
230 S. Dearborn  
Chicago, IL 60604

RECEIVED

APR 04 1990

U. S. EPA REGION 5  
OFFICE OF REGIONAL ADMINISTRATOR

Dear Mr. Adamkus:

I am the chief financial officer of General Motors Corporation, 3044 West Grand Boulevard, Detroit, Michigan 48202. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and nonsudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See Attachment A.

The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, liability coverage for both sudden and nonsudden accidental occurrences at the following facilities owned or operated by the following subsidiaries of the firm: None.

1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care or liability coverage is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: See Attachment A.

2. The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care or liability coverage of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: See Attachment B.

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under 40 CFR Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility: None.

This firm is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures, on the attached Alternative II, for the items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1989.

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below..



R. H. O'Connell  
Executive Vice President  
March 30, 1990



General Motors Corporation:

We have audited, in accordance with generally accepted auditing standards, the Consolidated Balance Sheet of General Motors Corporation (the "Corporation") and consolidated subsidiaries as of December 31, 1989 and the related Statements of Consolidated Income and Consolidated Cash Flows for the year then ended, and have issued our report thereon dated February 14, 1990. We have not performed any auditing procedures beyond the date of our report on the 1989 financial statements; accordingly, this report is based on our knowledge as of that date and should be read with that understanding.

At your request, we have performed the procedures enumerated below with respect to the accompanying letter from Mr. R. T. O'Connell to the Regional Administrator, U.S. EPA Region V, dated March 30, 1990. It is understood that this report is solely for filing with the addressee of the accompanying letter, and is not to be used for any other purpose. The procedures that we performed are summarized as follows:

1. We compared the amounts included in item 8 under the caption Alternative II in the letter referred to above with the corresponding amount in the financial statements referred to in the first paragraph.
2. We recomputed from, or reconciled to, the financial statements referred to in the first paragraph the information included in items 7 and 11 under the caption Alternative II in the letter referred to above.

Because the procedures referred to in the preceding paragraph were not sufficient to constitute an audit made in accordance with generally accepted auditing standards, we do not express an opinion on any of the information or amounts listed under the caption Alternative II in the aforementioned letter. In performing the procedures referred to above, however, no matters came to our attention that caused us to believe that the information or amounts included in items 7, 8 and 11 should be adjusted.

*Deloitte & Touche*

March 30, 1990

Alternative II  
( \$ in Millions)

- |   |    |                |
|---|----|----------------|
| 1. Sum of current closure and post-closure cost estimates<br>(total of all cost estimates listed above).....  | \$ | 93.5           |
| 2. Amount of annual aggregate liability coverage to be<br>demonstrated.....   | \$ | 24.0           |
| 3. Sum of lines 1 and 2.....  | \$ | 117.5          |
| 4. Current bond rating of most recent issuance and name<br>of rating service.....Standard & Poors.....  |    | AA-            |
| 5. Date of issuance of bond.....  |    | March 27, 1990 |
| 6. Date of maturity of bond.....  |    | March 15, 1993 |
| *7. Tangible net worth (if any portion of the closure or<br>post-closure cost estimates is included in "total<br>liabilities" on your financial statements you may add<br>that portion to this line)..... |    | 27,856.2       |
| *8. Total assets in the U.S. (required only if less than<br>90% of assets are located in the U.S.).....   |    | 131,595.8      |

- |   | YES | NO |
|---|-----|----|
| 9. Is line 7 at least \$10 million?.....  | X   |    |
| 10. Is line 7 at least 6 times line 3?.....   | X   |    |
| *11. Are at least 90% of assets located in the U.S.?<br>If not, complete line 12..... |     | X  |
| 12. Is line 8 at least 6 times line 3?.....   | X   |    |

U.S. EPA REGION V

OHIO

EPA ID: OHD020632998

Facility Name: GMC BOC: LORDSTOWN ASSEMBLY

Mailing Address: P.O. BOX 1406

WARREN, OH 44482

Facility Location: 2300 HALLOCK-YOUNG ROAD, County: TRUMBULL

Current closure cost estimate: \$463,500

EPA ID: OHD005050273

Facility Name: GMC CENTRAL FOUNDRY: DEFIANCE

Mailing Address: P.O. BOX 70

DEFIANCE, OH 43512

Facility Location: STATE ROUTE 281 EAST, County: DEFIANCE

Current closure cost estimate: \$12,100,000

Current post-closure cost estimate: \$207,000

EPA ID: OHD980569388

Facility Name: GMC CPC: MORaine ENGINE

Mailing Address: P. O. BOX 1291

MORaine, OH 45439

Facility Location: 4100 SPRINGBORO RD., County: MONTGOMERY

Current closure cost estimate: \$37,100

U.S. EPA REGION V

OHIO

EPA ID: OHDO45557766  
Facility Name: GMC DELCO MORAINÉ NDH: DAYTON NORTH  
Mailing Address: 1420 WISCONSIN BOULEVARD  
DAYTON, OH 45401  
Facility Location: 3100 NEEDMORE ROAD, County: MONTGOMERY  
Current closure cost estimate: \$119,600

EPA ID: OHDO60928561  
Facility Name: GMC DELCO MORAINÉ NDH: DAYTON SOUTH  
Mailing Address: 1420 WISCONSIN BOULEVARD  
DAYTON, OH 45401  
Facility Location: 1420 WISCONSIN BOULEVARD, County: MONTGOMERY  
Current closure cost estimate: \$131,400

EPA ID: OHDO04255410  
Facility Name: GMC DELCO PRODUCTS: KETTERING  
Mailing Address: P.O. BOX 1042  
DAYTON, OH 45420  
Facility Location: 2000 FORRER BOULEVARD, County: MONTGOMERY  
Current closure cost estimate: \$107,800

EPA ID: OHDO04294419  
Facility Name: GMC INLAND FISHER GUIDE: COLUMBUS  
Mailing Address: 200 GEORGESVILLE ROAD  
COLUMBUS, OH 43228  
Facility Location: 200 GEORGESVILLE ROAD, County: FRANKLIN  
Current closure cost estimate: \$105,000

U.S. EPA REGION V

OHIO

EPA ID: OHDO04201091  
Facility Name: GMC INLAND FISHER GUIDE: ELYRIA  
Mailing Address: 1400 LOWELL ST.  
ELYRIA, OH 44035  
Facility Location: 1400 LOWELL STREET, County: LORAIN  
Current closure cost estimate: \$3,532,200  
Current post-closure cost estimate: \$805,400

EPA ID: OHDO17958604  
Facility Name: GMC HARRISON RADIATOR: DAYTON  
Mailing Address: P.O. BOX 824  
DAYTON, OH 45401  
Facility Location: 300 TAYLOR STREET, County: MONTGOMERY  
Current closure cost estimate: \$789,900  
Current post-closure cost estimate: \$12,600

EPA ID: OHDO00817577  
Facility Name: GMC HARRISON RADIATOR: MORaine  
Mailing Address: P.O. BOX 824  
DAYTON, OH 45401  
Facility Location: 3600 DRYDEN ROAD, County: MONTGOMERY  
Current closure cost estimate: \$11,000,000  
Current post-closure cost estimate: \$250,000

EPA ID: OHDO00817023  
Facility Name: GMC DELCO PRODUCTS: DAYTON  
Mailing Address: P.O. BOX 1042  
DAYTON, OH 45401  
Facility Location: 2701 HOME AVENUE, County: MONTGOMERY  
Current closure cost estimate: \$49,000

EPA ID: OHDO97622336  
Facility Name: GMC INLAND FISHER GUIDE: EUCLID  
Mailing Address: 20001 EUCLID AVE.  
EUCLID, OH 44117  
Facility Location: 20001 EUCLID AVENUE, County: CUYAHOGA  
Current closure cost estimate: \$21,800

U.S. EPA REGION V

OHIO

EPA ID: OHD052151701

Facility Name: GMC DELCO PRODUCTS: VANDALIA

Mailing Address: P.O. BOX 1042  
DAYTON, OH 45401

Facility Location: 480 NORTH DIXIE HIGHWAY, County: MONTGOMERY

Current closure cost estimate: \$63,200

EPA ID: OHD001880442

Facility Name: GMC DELCO MORaine NDH: SANDUSKY

Mailing Address: 2509 HAYES AVE.  
SANDUSKY, OH 44870

Facility Location: 2509 HAYES AVENUE, County: ERIE

Current closure cost estimate: \$29,000

EPA ID: OHD018414292

Facility Name: GMC PACKARD ELECTRIC: WARREN DANA ST.

Mailing Address: P.O. BOX 431  
WARREN, OH 44483

Facility Location: 408 DANA STREET, County: TRUMBULL

Current closure cost estimate: \$27,000

EPA ID: OHD000817346

Facility Name: GMC PACKARD ELECTRIC: WARREN NORTH RIVER RD.

Mailing Address: P.O. BOX 431  
WARREN, OH 44483

Facility Location: LARCHMONT AND NORTH RIVER ROAD, County: TRUMBULL

Current closure cost estimate: \$237,900

Current post-closure cost estimate: \$620,500

EPA ID: OHD041063074

Facility Name: GMC TRUCK AND BUS: MORaine ASSEMBLY

Mailing Address: P.O. BOX 1291  
DAYTON, OH 45401

Facility Location: 2601 W. STROOP, County: MONTGOMERY

Current closure cost estimate: \$307,900



U.S. EPA REGION V

ILLINOIS

EPA ID: ILD005141551

Facility Name: GMC CENTRAL FOUNDRY: DANVILLE

Mailing Address: P.O. BOX 592

DANVILLE, IL 61832

Facility Location: I-74 AT "G" STREET, County: VERMILION

Current closure cost estimate: \$86,900

EPA ID: ILD006009690

Facility Name: GMC ELECTRO-MOTIVE: LAGRANGE

Mailing Address: 9301 W. 55TH ST.

LAGRANGE, IL 60525

Facility Location: 9301 W. 55TH STREET, County: COOK

Current closure cost estimate: \$1,188,600

U.S. EPA REGION V

INDIANA

EPA ID: IND000806836

Facility Name: GMC ALLISON GAS TURBINE DIVISION

Mailing Address: P.O. BOX 420, S44A

INDIANAPOLIS, IN 46206

Facility Location: 2355 SOUTH TIBBS AVE., County: MARION

Current closure cost estimate: \$10,932,200

Current post-closure cost estimate: \$1,914,200

EPA ID: IND000806851

Facility Name: GMC DELCO ELECTRONICS: KOKOMO BY PASS PLANT

Mailing Address: ONE CORPORATE CENTER, WH600

KOKOMO, IN 46904-9005

Facility Location: 1800 E. LINCOLN ROAD, County: HOWARD

Current closure cost estimate: \$218,800

U.S. EPA REGION V

INDIANA

EPA ID: IND006068050

Facility Name: GMC DELCO ELECTRONICS: KOKOMO PLANT 1

Mailing Address: ONE CORPORATE CENTER, M.S. WH600  
KOKOMO, IN 46904-9005

Facility Location: 700 E. FIRMIN STREET, County: HOWARD

Current closure cost estimate: \$27,800

EPA ID: IND000806844

Facility Name: GMC DELCO ELECTRONICS: KOKOMO PLANT 5

Mailing Address: ONE CORPORATE CENTER, WH600  
KOKOMO, IN 46904-9005

Facility Location: 1723 N. WASHINGTON STREET, County: HOWARD

Current closure cost estimate: \$73,200

EPA ID: IND980503825

Facility Name: GMC DELCO REMY: ANDERSON ACRE

Mailing Address: 2401 COLUMBUS AVENUE  
ANDERSON, IN 46018

Facility Location: 2401 COLUMBUS AVE., County: MADISON

Current closure cost estimate: \$232,600

EPA ID: IND000806877

Facility Name: GMC DELCO REMY: MUNCIE

Mailing Address: 4500 S. DELAWARE DR.  
MUNCIE, IN 47302

Facility Location: 4500 SOUTH DELAWARE DRIVE, County: DELAWARE

Current closure cost estimate: \$202,400

EPA ID: IND980700801

Facility Name: GMC INLAND FISHER GUIDE: ANDERSON

Mailing Address: 2915 PENDLETON AVE.  
ANDERSON, IN 46011

Facility Location: 2915 PENDLETON AVENUE, County: MADISON

Current closure cost estimate: \$152,900

U.S. EPA REGION V

INDIANA

EPA ID: IND079583720

Facility Name: GMC TRUCK & BUS OPERATIONS: INDIANAPOLIS

Mailing Address: P.O. BOX 388  
INDIANAPOLIS, IN 46206

Facility Location: 340 WHITE RIVER PARKWAY, County: MARION

Current closure cost estimate: \$31,300

EPA ID: IND00811616

Facility Name: UNIVERSAL TOOL & ENGINEERING COMPANY (OWNER)  
(GMC: DELCO REMY ANDERSON - OPERATOR)

Mailing Address: 8850 HAGUE ROAD  
INDIANAPOLIS, IN 46256

Facility Location: 8850 HAGUE ROAD, County: MARION

Current closure cost estimate: \$41,600

U.S. EPA REGION V

MICHIGAN

EPA ID: MID980568745

Facility Name: GMC AC ROCHESTER: FLINT AVERILL AVE.

Mailing Address: 1300 N. DORT HWY.

FLINT, MI 48556

Facility Location: 4134 DAVISON ROAD, County: GENESEE

Current closure cost estimate: \$667,300

EPA ID: MID005356647

Facility Name: GMC AC ROCHESTER: FLINT DORT HWY.

Mailing Address: 1300 N. DORT HWY.

FLINT, MI 48556

Facility Location: 1300 N. DORT HIGHWAY, County: GENESEE

Current closure cost estimate: \$67,400

EPA ID: MID980568620

Facility Name: GMC AC ROCHESTER: FLINT ENGINEERING

Mailing Address: 1300 N. DORT HWY.

FLINT, MI 48556

Facility Location: 1601 NORTH AVERILL AVENUE, County: GENESEE

Current closure cost estimate: \$74,700

EPA ID: MID005356654

Facility Name: GMC AC ROCHESTER: FLINT WEST

Mailing Address: 300 N. CHEVROLET AVE.

FLINT, MI 48555

Facility Location: 300 NORTH CHEVROLET AVENUE, County: GENESEE

Current closure cost estimate: \$50,300

U.S. EPA REGION V

MICHIGAN

EPA ID: MID005356712

Facility Name: GMC BOC: FLINT OPERATIONS

Mailing Address: 902 E. HAMILTON  
FLINT, MI 48550

Facility Location: 902 EAST HAMILTON, County: GENESEE

Current closure cost estimate: \$515,000

EPA ID: MID000718544

Facility Name: GMC BOC: LAKE ORION

Mailing Address: P.O. BOX 100  
PONTIAC, MI 48056

Facility Location: 4555 GIDDINGS ROAD, County: OAKLAND

Current closure cost estimate: \$202,700

EPA ID: MID005356894

Facility Name: GMC BOC: LANSING PLANT 1

Mailing Address: 920 TOWNSEND ST.  
LANSING, MI 48921

Facility Location: 920 TOWNSEND STREET, County: INGHAM

Current closure cost estimate: \$43,400

EPA ID: MID005356704

Facility Name: GMC BOC: CADILLAC CLARK STREET

Mailing Address: 2860 CLARK STREET  
DETROIT, MI 48232

Facility Location: 2860 CLARK STREET, County: WAYNE

Current closure cost estimate: \$98,500

U.S. EPA REGION V

MICHIGAN

EPA ID: MID980700827

Facility Name: GMC BOC: LANSING PLANT 2 & 3

Mailing Address: 920 TOWNSEND ST.

LANSING, MI 48921

Facility Location: 2800 & 2801 W. SAGINAW STREET, County: INGHAM

Current closure cost estimate: \$111,700

EPA ID: MID980700843

Facility Name: GMC BOC: LANSING PLANT 5

Mailing Address: 920 TOWNSEND ST.

LANSING, MI 48921

Facility Location: 2901 SOUTH CANAL ROAD, County: EATON

Current closure cost estimate: \$19,300

EPA ID: MID041793340

Facility Name: GMC CENTRAL FOUNDRY: SAGINAW GREY IRON & NODULAR

Mailing Address: 1629 NORTH WASHINGTON AVENUE

SAGINAW, MI 48605-5073

Facility Location: 2100 VETERANS MEMORIAL PARKWAY, County: SAGINAW

Current closure cost estimate: \$39,200

EPA ID: MID005356696

Facility Name: GMC CENTRAL FOUNDRY: SAGINAW MALLEABLE IRON

Mailing Address: 77 W. CENTER ST.

SAGINAW, MI 48605

Facility Location: 77 W. CENTER STREET, County: SAGINAW

Current closure cost estimate: \$80,400

U.S. EPA REGION V

MICHIGAN

EPA ID: MID005356688

Facility Name: GMC CPC: BAY CITY

Mailing Address: 100 FITZGERALD ST.

BAY CITY, MI 48708

Facility Location: 100 FITZGERALD STREET, County: BAY

Current closure cost estimate: \$95,000

EPA ID: MID005356886

Facility Name: GMC CPC: PONTIAC

Mailing Address: ONE PONTIAC PLAZA

PONTIAC, MI 48053

Facility Location: ONE PONTIAC PLAZA, County: OAKLAND

Current closure cost estimate: \$81,200

EPA ID: MID005356910

Facility Name: GMC CPC: PONTIAC FIERO ASSEMBLY

Mailing Address: 900 BALDWIN AVE.

PONTIAC, MI 48058

Facility Location: 900 BALDWIN AVENUE, County: OAKLAND

Current closure cost estimate: \$102,000

EPA ID: MID000809905

Facility Name: GMC CPC: ROMULUS

Mailing Address: 36880 ECORSE RD.

ROMULUS, MI 48174

Facility Location: 36880 ECORSE ROAD, County: WAYNE

Current closure cost estimate: \$47,500



U.S. EPA REGION V

MICHIGAN

EPA IO: MIO005356845

Facility Name: GMC OELCO MORaine NOH: SAGINAW MANUFACTURING

Mailing Address: 2328 E. GENESEE AVE.

SAGINAW, MI 48601

Facility Location: 2328 EAST GENESEE AVENUE, County: SAGINAW

Current closure cost estimate: \$40,000

EPA ID: MIO005356621

Facility Name: GMC DELCO PRODUCTS: LIVONIA

Mailing Address: 13000 ECKLES RD.

LIVONIA, MI 48151

Facility Location: 13000 ECKLES ROAD, County: WAYNE

Current closure cost estimate: \$276,000

EPA IO: MID005356860

Facility Name: GMC INLAND FISHER GUIDE: FLINT COLDWATER RD.

Mailing Address: 1245 E. COLDWATER RD

FLINT, MI 48559-0001

Facility Location: 1245 EAST COLDWATER ROAD, County: GENESEE

Current closure cost estimate: \$3,036,800

Current post-closure cost estimate: \$870,600

U.S. EPA REGION V

MICHIGAN

EPA ID: MID082220757

Facility Name: GMC GM PROVING GROUND: MILFORD

Mailing Address: 3300 GENERAL MOTORS RD.  
MILFORD, MI 48042

Facility Location: 3300 GENERAL MOTORS RD., County: OAKLAND

Current closure cost estimate: \$74,100

EPA ID: MID050615996

Facility Name: GMC GM TECHNICAL CENTER: WARREN

Mailing Address: 6250 CHICAGO RD.  
WARREN, MI 48090-9005

Facility Location: 29999 VAN DYKE, County: MACOMB

Current closure cost estimate: \$402,600

U.S. EPA REGION V

MICHIGAN

EPA ID: MID084571256

Facility Name: GMC INLAND FISHER GUIDE: ADRIAN PLANT

Mailing Address: 1450 E. BEECHER STREET

ADRIAN, MI 48221

Facility Location: 1450 E. BEECHER STREET, County: LENAWE

Current closure cost estimate: \$26,800

EPA ID: MID020105565

Facility Name: GMC SAGINAW: DETROIT FORGE

Mailing Address: 8435 ST. AUBIN

DETROIT, MI 48212

Facility Location: 8435 ST. AUBIN, County: WAYNE

Current closure cost estimate: \$29,000

EPA ID: MID000721738

Facility Name: GMC AC ROCHESTER: COOPERSVILLE

Mailing Address: 999 RANDALL STREET

COOPERSVILLE, MI 49404

Facility Location: 999 RANDALL STREET, County: OTTAWA

Current closure cost estimate: \$2,000

EPA ID: MID017079625

Facility Name: GMC AC ROCHESTER: GRAND RAPIDS

Mailing Address: 2100 BURLINGAME AVENUE SW

GRAND RAPIDS, MI 49501

Facility Location: 2100 BURLINGAME AVENUE SW, County: KENT

cost closure cost estimate: \$89,500

EPA ID: MID086744802

Facility Name: GMC SAGINAW: DETROIT

Mailing Address: 1840 HOLBROOK AVENUE

DETROIT, MI 48212

Facility Location: 1840 HOLBROOK AVENUE, County: WAYNE

Current closure cost estimate: \$1,200,000

Current post-closure cost estimate: \$120,000

U.S. EPA REGION V

MICHIGAN

EPA ID: MID003912920

Facility Name: GMC SERVICE PARTS OPER.: DRAYTON PLAINS

Mailing Address: 6060 W. BRISTOL RD.

FLINT, MI 48554

Facility Location: 5260 WILLIAMS LAKE ROAD, County: OAKLAND

Current closure cost estimate: \$72,000

EPA ID: MID003906773

Facility Name: GMC SERVICE PARTS OPER.: FLINT

Mailing Address: 6060 W. BRISTOL RD.

FLINT, MI 48554

Facility Location: 6060 WEST BRISTOL ROAD, County: GENESEE

Current closure cost estimate: \$65,500

EPA ID: MID005356902

Facility Name: GMC TRUCK & BUS: PONTIAC CENTRAL/EAST

Mailing Address: 660 SOUTH BOULEVARD EAST

PONTIAC, MI 48053

Facility Location: 660 SOUTH BOULEVARD EAST, County: OAKLAND

Current closure cost estimate: \$224,000

EPA ID: MID980568836

Facility Name: GMC TRUCK & BUS: PONTIAC WEST

Mailing Address: 275 FRANKLIN ROAD

PONTIAC, MI 48053

Facility Location: 660 SOUTH BOULEVARD EAST, County: OAKLAND

Current closure cost estimate: \$56,000

U.S. EPA REGION V

MICHIGAN

EPA ID: MID005356951

Facility Name: GMC TRUCK & BUS: VAN SLYKE COMPLEX

Mailing Address: G-2238 W. BRISTOL RD.

FLINT, MI 48553

Facility Location: VAN SLYKE AT ATHERTON ROAD, County: GENESEE

Current closure cost estimate: \$1,507,000

U.S. EPA REGION V

MICHIGAN

EPA ID: MID005356704

Facility Name: GMC BOC: DETROIT CLARK AVE.

Mailing Address: 2860 CLARK AVE.

DETROIT, MI 48210

Facility Location: 2860 CLARK AVENUE, County: WAYNE

Current closure cost estimate: \$95,000

EPA ID: MID005356712

Facility Name: GMC BOC: FLINT OPERATIONS

Mailing Address: 902 E. HAMILTON

FLINT, MI 48550

Facility Location: 902 EAST HAMILTON BLDG. 85, County: GENESEE

Current closure cost estimate: \$565,500

EPA ID: MID000718544

Facility Name: GMC BOC: LAKE ORION

Mailing Address: P.O. BOX 347

LAKE ORION, MI 48053

Facility Location: 4555 GIDDINGS ROAD, County: OAKLAND

Current closure cost estimate: \$122,000

EPA ID: MID005356894

Facility Name: GMC BOC: LANSING PLANT 1

Mailing Address: 920 TOWNSEND ST.

LANSING, MI 48921

Facility Location: 920 TOWNSEND STREET, County: INGHAM

Current closure cost estimate: \$40,000

O: WMD ✓  
cc: RF

General Motors Corporation

Mr. Valdas V. Adamkus  
Regional Administrator  
U.S. EPA Region V  
230 S. Dearborn  
Chicago, IL 60604

RECEIVED

APR 24 1981  
U.S. EPA, REGION V  
WASTE MANAGEMENT DIVISION  
OFFICE OF THE DIRECTOR

Dear Mr. Adamkus:

I am the chief financial officer of General Motors Corporation, 3044 West Grand Boulevard, Detroit, Michigan 48202. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and non-sudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: See Attachments A and B.

The firm identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, liability coverage for both sudden and non-sudden accidental occurrences at the following facilities owned or operated by the following subsidiaries of the firm: None.

1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: See Attachments A and B.

2. The firm identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: See Attachment B.

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4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility: None.

This firm is required to file a Form 10-K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

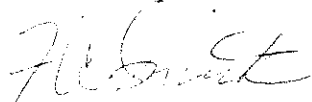
The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1987.

ALTERNATIVE I  
(\$ In Millions)

1. Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	\$	59.1
2. Amount of annual aggregate liability coverage to be demonstrated	\$	8.0
3. Sum of lines 1 and 2	\$	67.1
*4. Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)	\$	54,196.8
*5. Tangible net worth	\$	28,038.7
*6. Net worth	\$	33,225.1
*7. Current assets	\$	39,771.5
*8. Current liabilities	\$	25,528.2
9. Net working capital (line 7 minus line 8)	\$	14,243.3
*10. The sum of net income plus depreciation, depletion, and amortization	\$	9,662.9
*11. Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	\$	68,168.1
12. Is line 5 at least \$10 million?	YES	NO
13. Is line 5 at least 6 times line 3?	X	—
14. Is line 9 at least 6 times line 3?	X	—
*15. Are at least 90% of assets located in the U.S.? If not complete line 16.	—	X
16. Is line 11 at least 6 times line 3?	X	—
17. Is line 4 divided by line 6 less than 2.0?	X	—
18. Is line 10 divided by line 4 greater than 0.1?	X	—
19. Is line 7 divided by line 8 greater than 1.5?	X	—



I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below..

A handwritten signature in dark ink, appearing to read "F. A. Smith", is written over the typed name.

F. A. Smith  
Executive Vice President  
March 30, 1988

1114 Avenue of the Americas  
New York, New York 10036-7778  
(212) 790-0500  
International Telex: 66262  
ITT Telex: 4995707

**General Motors Corporation:**

We have examined the Consolidated Balance Sheet of General Motors Corporation (the "Corporation") and consolidated subsidiaries as of December 31, 1987 and the related Statements of Consolidated Income and Changes in Consolidated Financial Position for the year then ended, and have issued our opinion thereon dated February 8, 1988. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. We have not performed any auditing procedures beyond the date of our opinion on the 1987 financial statements; accordingly, this report is based on our knowledge as of that date and should be read with that understanding.

At your request, we have performed the procedures enumerated below with respect to the accompanying letter from Mr. F. A. Smith to the Regional Administrator, U.S. EPA Region V, dated March 30, 1988. It is understood that this report is solely for filing with the addressee of the accompanying letter, and is not to be used for any other purpose. The procedures that we performed are summarized as follows:

1. We compared the amounts included in items 6, 7, 8 and 11 under the caption Alternative I in the letter referred to above with the corresponding amounts in the financial statements referred to in the first paragraph.
2. We recomputed from, or reconciled to, the financial statements referred to in the first paragraph the information included in items 4, 5, 10 and 15 under the caption Alternative I in the letter referred to above.

Because the procedures referred to in the preceding paragraph were not sufficient to constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the information or amounts listed under the caption Alternative I in the aforementioned letter. In performing the procedures referred to above, however, no matters came to our attention that caused us to believe that the information or amounts included in items 4, 5, 6, 7, 8, 10, 11 and 15 should be adjusted.

*Deloitte Haskins & Sells*

March 30, 1988

ORIGINAL COPY OF LETTER AND ENCLOSURE (1987 ANNUAL REPORT) ARE FILED  
AT:

OHD 020 632 998  
GMC BOC LORDSTOWN ASSEMBLY  
LORDSTOWN, OHIO



MAR 26 1987

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:  
SHE-12

*MID 005 356 704*

General Motors Corporation  
General Motors Building  
3044 W. Grand Boulevard  
Detroit, Michigan 48202

Re: RCRA Financial Responsibility

Dear Owner/Operator:

On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the United States Environmental Protection Agency (U.S. EPA) to administer a hazardous waste program in lieu of the Federal program. As a result of final authorization, Michigan is required to enforce the provisions of the Resource Conservation and Recovery Act (RCRA). One of these provisions (40 CFR Part 265, Subpart H) requires all hazardous waste facilities to demonstrate financial responsibility for liability coverage and closure/post-closure care.

To implement this aspect of authorization, financial documents must be written to satisfy the requirements of the Michigan Administrative Code 1985 AACs, Part 7, which is the Michigan equivalent of 40 CFR Part 265, Subpart H. This letter is to notify you that your financial test should be updated and sent to the Director of the Michigan Department of Natural Resources within 90 days after the close of your fiscal year.

If you have any questions or desire additional information, please contact Ms. Sharon Johnson at (312) 886-4581 or Ronald Brown at (312) 353-7921.

Sincerely yours,

*Wm. E. Muno*

William E. Muno, Chief  
RCRA Enforcement Section

cc: John Bohunsky, MDNR

U.S. EPA ID #: MID000721 3 ✓

GMC ROCHESTER PROD DIV COOPERSVILL\*  
2100 BURLINGAME  
AND RAPIDS MI 49501

U.S. EPA ID #: MID00391292D ✓

GMC WHS & DIST DIV DRAYTON PLAINS  
6060 W BRISTOL ROAD  
FLINT MI 48554

U.S. EPA ID #: MID98070D827 ✓

GMC OLDSMOBILE DIV PLTS 2 & 3  
P D BOX 30061  
LANSING MI 48909

U.S. EPA ID #: MID017079625 ✓

GMC ROCHESTER PROD DIV WYOMING PLT  
2100 BURLINGAME  
GRAND RAPIDS MI 49501

U.S. EPA ID #: MIDDD53569D2 ✓

GMC TRUCK & BUS GROUP  
660 S BLVD E  
PONTIAC MI 48053

U.S. EPA ID #: MIDDD03906773 ✓

GMC WHS & DIST DIV FLINT  
6060 W BRISTOL ROAD  
FLINT MI 48554

U.S. EPA ID #: MID005356000 ✓

GMC FISHER BODY DIV COLDWATER RD  
1245 E COLDWATER RD  
COLDWATER MI 48559

U.S. EPA ID #: MID000718544 ✓

GMC GMAD LAKE ORION TWP PLT  
PO BOX 347  
LAKE ORION MI 48035

U.S. EPA ID #: MID005356704 ✓

GMC CADILLAC MOTOR CAR CLARK PLT  
2860 CLARK ST  
DETROIT MI 48232

U.S. EPA ID #: MID005356688 ✓

GMC CHEVROLET BAY CITY  
100 FITZGERALD ST  
BAY CITY MI 48706

U.S. EPA ID #: MID086744802 ✓

GMC CHEVROLET DETROIT GEAR AND AXLE  
1840 HOLBROOK AVE  
DETROIT MI 48212

U.S. EPA ID #: MID005356621 ✓

GMC CHEVROLET LIVONIA  
13000 ECKLES RD  
LIVONIA MI 48151

U.S. EPA ID #: MID005356803 ✓

GMC DETROIT DIESEL ALLISON DIV RED\*  
13400 WEST OUTER DR  
DETROIT MI 48239

U.S. EPA ID #: MID005356787 ✓

GMC FISHER BODY DIV FORT ST  
6307 WEST FORT STREET  
DETROIT MI 48209

U.S. EPA ID #: MID000724740 ✓

GMC HYDRA-MATIC DIV  
ONE HYDRA-MATIC DRIVE  
THREE RIVERS MI 49093

U.S. EPA ID #: MID000718551 ✓

GMC HYDRA-MATIC DIV THREE RIVERS P\*  
ONE HYDRA-MATIC DR  
THREE RIVERS MI 49093

U.S. EPA ID #: MID005356894 ✓

GMC OLDSMOBILE DIV PLT 1  
PO BOX 30061  
LANSING MI 48909

U.S. EPA ID #: MID082220757 ✓

GMC PROVICING GROUND MILFORD  
HICKORY RIDGE & GM ROADS  
MILFORD MI 48042

U.S. EPA ID #: MID980568836 /

GMC TRUCK & COACH DIV PONTIAC WEST  
660 S BLVD E  
PONTIAC MI 48053

U.S. EPA ID #: MID980700843 ✓

GMC OLDSMOBILE DIV PLT 5  
PO BOX 30061  
LANSING MI 48909

U.S. EPA ID #: MID980568 .0 ✓

GMC AC SPARK PLUG DIV DAVISON ENG  
300 NORTH DORT HIGHWAY  
FLINT MI 48556

U.S. EPA ID #: MID005356647 ✓

GMC AC SPARK PLUG DIV DORT HWY  
1300 N DORT HWY  
FLINT MI 48556

U.S. EPA ID #: MID980568570 ✓

GMC AC SPARK PLUG DIV WASTE TRMT  
1300 N DORT HIGHWAY  
FLINT MI 48556

U.S. EPA ID #: MID005356795 ✓

GMC ASSEMBLY DIV  
2625 TYLER ROAD  
YPSILANTI MI 48197

U.S. EPA ID #: MID005356696 ✓

GMC CENTRAL FOUNDRY DIV SAG MAL IR\*  
77 W CENTER ST  
SAGINAW MI 48605

U.S. EPA ID #: MID076380583 ✓

GMC CHEVROLET DETROIT ASSEMBLY  
601 PIQUETTE  
DETROIT MI 48202

U.S. EPA ID #: MID005356654 ✓

GMC CHEVROLET FLINT MFG  
300 NORTH CHEVROLET AVENUE  
FLINT MI 48555

U.S. EPA ID MID041793340 ✓

GMC CHEVROLET SAGINAW CASTING & PA\*  
2100 VETERANS MEMORIAL PARKWAY  
SAGINAW MI 48601

U.S. EPA ID #: MID000809905 ✓

GMC DETROIT DIESEL ALLISON ROMULUS\*  
36880 ECKSE RD  
ROMULUS MI 48174

U.S. EPA ID #: MID005356712 ✓

GMC BUICK MOTOR DIV  
902 E HAMILTON ST BLDG 85  
FLINT MI 48550

U.S. EPA ID #: MID084571256 ✓

GMC CHEVROLET ADRIAN MFG  
1450 E BEECHER ST  
ADRIAN MI 49221

U.S. EPA ID #: MID020105565 ✓

GMC CHEVROLET DETROIT FORGE  
8435 ST AUBIN  
DETROIT MI 48212

U.S. EPA ID #: MID005356951 ✓

GMC CHEVROLET FLINT VAN SLYKE COMP\*  
G-3248 VAN SLYKE RD  
FLINT MI 48552

U.S. EPA ID #: MID005356845 ✓

GMC CHEVROLET SAGINAW MFG  
2328 EAST GENESEE AVE  
SAGINAW MI 48605